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May 6, 2021

**BY ECF**

Honorable Jesse M. Furman  
United States District Judge  
United States District Court, Southern District of New York  
40 Centre Street, Room 2202  
New York, NY 10007

**Re: *Fuld, et al. v. The Palestine Liberation Organization, et al.*,  
Case No. 1:20-cv-03374 (JMF)**

Dear Judge Furman:

We are counsel to Defendants, the Palestine Liberation Organization and the Palestinian Authority, in the above-referenced matter.

Pursuant to the Court's Order of May 5, 2021 (ECF 34), the parties attempted to reach agreement on a joint proposed certification of Defendants' challenge to the constitutionality of the Promoting Security and Justice for Victims of Terrorism Act of 2019. Although the parties narrowed their differences, they were unable to reach full agreement. Accordingly, pursuant to the Court's May 5 Order, we attach hereto as Exhibit A Defendants' proposed certification order, as Exhibit B Plaintiffs' proposed certification order, and as Exhibit C a redline comparison showing Plaintiffs' changes to Defendants' proposed certification order.

As directed by the Court, we will email to Chambers a Microsoft Word version of each of the exhibits.

Respectfully submitted,

Squire Patton Boggs (US) LLP

A handwritten signature in blue ink, appearing to read "Gassan A. Baloul", written over a light blue horizontal line.

Gassan A. Baloul

cc: All counsel (by ECF)

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